

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>INFORMATION</u>
	:	
- v. -	:	19 Cr. 69
	:	
PAUL ROSENFELD,	:	
	:	
Defendant.	:	
	:	
- - - - -	x	

COUNT ONE

(Unlawful Manufacture of a Destructive Device)

The United States Attorney charges:

1. From at least in or about August 2018, up to and including in or about October 2018, in the Southern District of New York and elsewhere, PAUL ROSENFELD, the defendant, knowingly made a firearm, as defined in Title 26, United States Code, Sections 5845(a)(8) and 5845(f)(3), without having taken the steps set forth in subsections (a) through (e) of Title 26, United States Code, Section 5822, to wit, ROSENFELD manufactured a destructive device using, among other things, explosive powder at his residence in Tappan, New York.

(Title 26, United States Code, Sections 5822,
5861(f), and 5871.)

COUNT TWO

(Interstate Transportation and Receipt of an Explosive)

The United States Attorney further charges:

2. From at least in or about August 2018 up to and including in or about October 2018, in the Southern District of New York and elsewhere, PAUL ROSENFELD, the defendant, did knowingly transport and receive, and attempt to transport and receive, in interstate and foreign commerce, an explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully to damage and destroy real property, to wit, ROSENFELD transported explosive powder from New Jersey to New York, which he used to construct an explosive device that he intended to detonate on the National Mall in Washington, D.C.

(Title 18, United States Code, Section 844(d).)

FORFEITURE ALLEGATIONS

3. As a result of committing the offense alleged in Count One of this Information, PAUL ROSENFELD, the defendant, shall forfeit to the United States, pursuant to Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461, any and all firearms involved in said offense.

4. As a result of committing the offense alleged in Counts Two of this Information, PAUL ROSENFELD, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 844(c) and 982(a)(2)(B), and Title 28, United

States Code, Section 2461, (i) any and all explosive materials involved or used or intended to be used in said offense, and (ii) any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said offense, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Asset Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 844 and 982;
Title 26, United States Code, Section 5872; and
Title 28, United States Code, Section 2461.)


GEOFFREY S. BERMAN
United States Attorney

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(Title 18, United States Code, Sections
844(d); Title 26, United States Code,
Sections 5822, 5861(d), 5861(f), and
5871.)

GEOFFREY S. BERMAN
United States Attorney.
